

FILED _____ ENTERED _____
LOGGED *jm* RECEIVED

MAR 27 2025

CLERK OF COURT
DISTRICT OF MARYLAND

DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

In Re DMCA Subpoena to
Cloudflare, Inc.

Case No. 25-mc-152

**REQUEST TO THE CLERK FOR ISSUANCE OF SUBPOENA TO
CLOUDFLARE, INC. PURSUANT TO 17 U.S.C. § 512(h) TO IDENTIFY
ALLEGED INFRINGER**

Petitioner Fox News Network, LLC (“Fox News”), by counsel, hereby requests that the Clerk of this Court issue a subpoena to Cloudflare, Inc. (“Cloudflare”) to identify the alleged infringer(s) at issue pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “Section 512(h) Subpoena”). The proposed Section 512(h) Subpoena is attached hereto as Exhibit A.

The proposed Section 512(h) Subpoena is directed to Cloudflare, the content delivery network for the domain name NewsLive.com (“Subject Domain Name”). The owner and operator(s) of the Subject Domain Name have used the domain to infringe one or more copyrights owned by Fox News. Fox News has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C. § 512(h):

- (1) Fox News has submitted a copy of the notification sent pursuant to 17 U.S.C. § 512(c)(3)(A) as Attachment 1 to the attached Declaration of David E. Weslow dated March 26, 2025 (“Weslow Decl.”). Ex. B.
- (2) Fox News has submitted the proposed Section 512(h) Subpoena attached hereto as Exhibit A; and
- (3) Fox News, through its counsel of record, has submitted a sworn declaration confirming that the purpose for which the Section 512(h) Subpoena is sought

is to obtain the identity of an alleged infringer or infringers and such information will only be used for the purpose of protecting Fox News's rights under Title 17 of the United States Code. *See* Weslow Decl. ¶ 5.

Having complied with the statutory requirements, Fox News respectfully requests that the Clerk expeditiously issue and sign the proposed Section 512(h) Subpoena pursuant to 17 U.S.C. § 512(h)(4) and return it for service to Cloudflare, Inc.

Respectfully submitted,

/s/ David E. Weslow /s/
David E. Weslow
WILEY REIN LLP
2050 M Street NW
Washington, DC 20036
(202)719-7000 - phone
dweslow@wiley.law

Counsel for Fox News Network, LLC